## Washington State Dept of Ecology Letter on agency letterhead sent to list below

## Dear Wood Furnace Manufacturer/Distributor:

The purpose of this letter is to clarify Washington State's solid fuel burning device regulations, as they pertain to the sale of wood furnaces, and point out the differences between Washington's requirements and federal EPA requirements.

Effective January 1, 1995, Washington regulations required that all solid fuel burning devices offered for sale in Washington meet Emission Performance Standards described in Washington Administrative Code 173-433-100 (3). These standards limit particulate matter emissions to:

- two and one-half grams per hour for catalytic woodstoves, and
- four and one-half grams per hour for **all other** solid fuel burning devices.

A solid fuel burning device is any device that burns wood, coal, or any other non-gaseous or non-liquid solid fuels for aesthetic or space-heating purposes in a private residence or commercial establishment, which has a heat input less than one million British thermal units (Btu) per hour. Therefore, by state definition, a wood furnace is a solid fuel burning device, and therefore must meet the particulate matter emission standard of four and one-half grams per hour before it may be offered for sale in Washington.

The Washington state standards differ from EPA New Source Performance Standards (NSPS) for Wood Heaters in the following ways:

- Washington's particulate emission limits are more stringent than those specified in the federal NSPS, and
- Washington's particulate emission limits apply to all solid fuel burning devices, including wood furnaces.

While EPA regulations still exempt certain devices from testing and/or certification requirements, Washington regulations require that all devices be tested and certified to comply with the more stringent Washington particulate emission limits.

Therefore, wood furnaces with heat inputs of less than one million Btu may not be sold anywhere within the state of Washington unless the Department of Ecology has determined that the furnace meets state emission standards. Any retailer, wholesaler or

distributor offering for sale or selling a non-compliant device, may be subject to formal enforcement action.

Wood furnaces with heat inputs of **one million Btu per hour or more**, while not subject to solid fuel burning device standards, upon operation, must not exceed the visible emission standard of 20% opacity for more than three minutes in any one hour, contained in WAC 173-400-040(1). In addition, some local air authorities may require a demonstration that the units meet specific grain loading standards, as measured by EPA method 5 test in Appendix A to 40 CFR Part 60.

Complete text of the Washington state solid fuel burning device rule can be found at http://www.ecy.wa.gov/pubs/wac173433.pdf.

If you have any questions, please call Tom Todd at (360) 407-7528.

Sincerely,

Sarah Rees Air Quality Program

## Mail to:

Alternate Heating Systems, Inc. 2395 Little Egypt Road Harrisonville, PA 17228

Aqua-Therm LLC 48301 State Hwy 55 Brooten, MN 56316

Central Boiler, Inc. 20502 160th Street Greenbush, MN 56726

Charmaster Products, Inc. 2307 Highway 2 West Grand Rapids, MN 55744

Dectra Corporation 3425 33rd Ave NE St. Anthony, MN 55418

Freedom Outdoor Furnace 7958 Curwnsvlle Tyrne Hwy Olanta, PA 16863-8710

Global Hydronics Box 717 Winkler, Manitoba R6W 4A1 Canada

Hardy Manufacturing 12345 Road 505 Philadelphia, MS 39350

Heatmor Inc. 105 Industrial Park Court NE Warroad, MN 56763

Heat Innovations 499 Manitoba Road P.O. Box 989 Winkler, MB R6W 4B1 Canada

Heatsource1 2201 Ridgeview Drive Beatrice, NE 68310 Hicks Waterstoves and Solar Systems 2541 South Main Street Mount Airy, NC 27030

Horstmann Industries, Inc. 301 Second Street Elroy, WI 53929

Innotech Developments 2015 James Street South Thunder Bay, ON P7J1G6 Canada

Johnson Manufacturing N5499 County E Ogdensburg, WI 54962

Mahoning Outdoor Furnace RD #1 Box 250 Mahaffey, PA 15754-0000

Mahoning Outdoor Furnace Somerset, PA 15501

Noonan's Welding & Heating 105 1st Sreet South Keewatin, MN 55753

Northwest Manufacturing 600 Polk Ave SW Red Lake Falls, MN 56750

Outside Heating Systems - Wood Doctor PO Box 567 Stewiacke, NS B0N 2JO Canada

Pro-Fab Industries/Cozeburn Box 112 Arborg, Manitoba, ROC OAO Canada

Tarm USA, Inc. Main Street Box 285 Lyme, NH 03768 Taylor Manufacturing, Inc. PO Box 518 US HWY 701 South Elizabethtown, NC 28337

Timber Ridge, Inc. 2020 Highway 11-E Jonesborough, TN 37659 Turbo Burn, Inc. 4309 E Joseph Spokane, WA 99217

CB Sales, Inc. 9924 E. Woolard Rd Colbert, WA 99005